1 2 3 4 5 6 7	JOSEPH P. RUSSONIELLO (CABN 44332) United States Attorney BRIAN J. STRETCH (CABN 163973) Chief, Criminal Division CYNTHIA STIER (DCBN 423256) Assistant United States Attorney 450 Golden Gate Avenue, Box 36055 San Francisco, California 94102-3495 Telephone: (415) 436-7000 FAX: (415) 436-7234 Attorneys for United States
8	UNITED STATES DISTRICT COURT
9	NORTHERN DISTRICT OF CALIFORNIA
10	SAN JOSE DIVISION
11	
12	UNITED STATES OF AMERICA,) No. CR 08-0479- JW
13	Plaintiff,
14	v.) STIPULATION AND
15 16	LUIS ENRIQUE DEMETRIO MENDOZA) a/k/a DEMETRIO MENDOZA, a/k/a LUIS E. MENDOZA,)
17	Defendant.
18	·
19	The United States and the defendant in this action, through undersigned counsel, hereby
20	stipulate and agree as follows:
21	1. The United States has produced to defendant's counsel of record in this matter
22	discovery containing sensitive tax, personal and/or financial information of third parties, subject
23	to the following conditions.
24	2. Defense counsel shall not disclose any documents or information produced by the
25	United States to anyone except her client, any defense witnesses, experts or investigators retained
26	in this case, or any defense staff working on the case. Moreover, defendant, defense witnesses,
27	experts or investigators, or defense staff shall not disclose such documents or information to
28	anyone, absent further order of the Court.

- 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 26 27 28
- 3. The documents and information described in paragraph 1 shall be used only to prepare arid evaluate the defense in this proceeding. Any person to whom the documents or information are disclosed must be provided with a copy of this Stipulation and Order. The materials provided to defense counsel pursuant to this order, and any copies thereof, shall be returned to the government at the conclusion of this case.
- 4. The documents described above shall not be copied at all unless copying is necessary for preparation of the defense in this proceeding. Any copy of the materials that is made shall be accompanied at all times by a copy of this Stipulation and Order. No document or copy thereof shall be left with any defense witness.

DATED: August 25, 2008

/s/ Cynthia Stier CYNTHIA STIER

Assistant United States Attorney

DATED: August 25, 2008

/s/ Frederic Warner FREDERIC WARNER Counsel for Luis Mendoza

ORDER

In light of the stipulation and agreement of the parties to this action, and good cause appearing therefor, it is HEREBY ORDERED that disclosure of the above-described information shall be restricted as set forth in Paragraphs 1 through 4 above.

IT IS SO ORDERED.

DATED: October 9, 2008

States District Judge

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US v. Luis Mendoza, Case No. CR 08-0479- JW Stipulation and [proposed] Order Regarding Discovery